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BEFORE THE ARIZONA CORPORATION COMMISSION

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CARL J. KUNASEK
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH SECTION 271 OF
THE TELECOMMUNICATIONS ACT OF
1996

) DOCKET NO. T-00000A-97-0238

)

) **ELI'S RESPONSE TO JOINT
MOTION OF STAFF AND U S
WEST**

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)

Electric Lightwave, Inc. hereby responds to the Joint Motion for

Workshops on Remaining Section 271 Issues filed by Commission Staff and U S

WEST. As set forth below, ELI objects to the Joint Motion and the procedural

schedule contained therein. On those issues, ELI joins in and incorporates

AT&T's Response to Joint Motion of Staff and U S WEST and the responses of
the other CLECs.

Further, ELI stresses that the proposed workshop schedule advocated
by Staff and U S WEST in the Joint Motion places serious resource and manpower
demands on ELI that may jeopardize ELI's involvement in the workshop process.

Under the Joint Motion, various workshops on different issues will be conducted
concurrently and/or in rapid succession and would exceed ELI's manpower and
resource limitations. The Arizona workshops would be stacked on top of one

1 another and be simultaneous with workshops in other states. ELI simply doesn't
2 have the resources and manpower to accommodate the workshop schedule as
3 dictated by the Joint Motion. ELI will be unable to dedicate the necessary
4 resources to attend multiple back-to-back workshops, draft testimony and
5 comments and prepare for the workshops in Arizona and other jurisdictions.
6

7 As such, ELI respectfully requests that the Hearing Officer schedule
8 the workshop process to conclude in May or June 2001 with each series of
9 workshops complete before the next series begins. Such a schedule would allow
10 ELI to participate fully in the Arizona workshops given the company's resource
11 and manpower limitations.
12

13 DATED this 7 day of June, 2000.
14

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